

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET No. : 2020-260-T

Application of:)	
Anytyme Movers, LLC)	MOTION FOR PERMISSION
For a Class E Household Goods Application)	TO PRESENT SHIPPER
Certificate of Public Convenience and)	WITNESS TESTIMONY BY
Necessity for operation of a Motor Vehicle)	AFFIDAVIT

Comes Now Anytyme Movers, LLC ("Applicant") and moves for permission to present the testimony of its shipper witness by Affidavit. The Commission's regulation concerning the proof required to support an application for Certificate of Public Convenience and Necessity for a Class E mover of household goods with statewide authority is found in S.C. Code Regs. 103-333 (the Regulation).

Regarding the testimony of shipper witnesses, the regulation states:

PC&N (Household Goods or Waste for Disposal). An application for a Certificate of PC&N were to amend a Certificate of PC&N to operate as a carrier of household goods were hazardous waste for disposal by motor vehicle may be approved by a showing that the applicant is fit, willing, and able to appropriately perform the proposed service and that the public convenience and necessity are not already being served in the territory by existing authorized service. The public convenience and necessity criterion must be shown by the use of shipper witnesses, if the applicant applies for authority for more than three contiguous counties. If the commission determines that the public convenience and necessity is already being served, the commission may deny the application. The following criteria should be used by the commission in determining that an applicant for motor carrier operating authority is fit, willing, and able to provide the requested service to the public:

S.C. Regs. 103-133-1

In the interest of administrative economy (judicial economy in the administrative law context), the Applicant requests that the Commission allow the regulations requirement of use of a shipper witness" to be satisfied by the submission of an Affidavit.

The Office of Regulatory Staff (the only other party that the applicant in this Docket" would have the right to contest the adequacy of the Affidavit. Counsel for the Applicant has discussed this Motion with counsel for the ORS and the ORS does not object to the relief sought herein.

Therefore, Applicant respectfully requests the commission allow Applicant to present the testimony of its shipper witness by Affidavit. The Applicant attaches the Shipper Witness Affidavit of Nelson Jones as Exhibit 1 hereto.

Degenhart & Degenhart Law, LLC
s/ Paul V. Degenhart
2131 Park Street
Columbia, SC 29201
803-771-6050
pdegenhart@degenhartlaw.com

AFFIDAVIT

In Re:

Anytyme Movers, LLC

Docket No.: 2020-260-T

Household Goods Application

Profile Shipper Witness Testimony

The witness having been duly sworn states as follows:

My name is Nelson Jones.

I am over the age of 18 and competent to give this Affidavit.

I reside at 6311 Old Leesburg Rd Hopkins, SC 29061

I own and am employed by Basketball Jones Elite Training, LLC.

I am presenting testimony today on behalf of Anytyme Movers, LLC a South Carolina Limited Liability Company Whose Application Is Pending before the Public Service Commission of South Carolina for a Class B (Household Goods Mover) Certificate of Public Convenience and Necessity.

In the industry of household goods and having experienced speaking to many customers in need of good moving service, I am aware of the need for more good companies.

Through many inquiries of the demand for moving service I am familiar with the need of competent, affordable, trustworthy movers.

For example, scheduling service with a moving company at the months end, which is also when the highest number of real estate closings taking place, many potential customers often complain about the high cost of movers and I believe having more moving companies in the greater Columbia area can help reduce and control costs.

I know there is a need for more movers in this geographical area.

I am connected with the applicant in this case through years of doing business together now for more than 10 years. We have remained business partners and through witnessing years of commitment to high quality service and satisfying each customer's need, I am well aware that Leroy Williams II and Anytyme Movers, LLC provide competent, affordable and trustworthy service.

I am 100% confident that this applicant would be an excellent addition to the household goods movers in the State of South Carolina.

FURTHER AFFIANT SAYETH NOT.

Nelson Jones

Nelson Jones

Sworn to and subscribed before me

Natalie A. Wilson a Notary Public in and for the state of South Carolina

This 25th day of January 2021.

Natalie A. Wilson

Notary Public

[Seal]

My Commission Expires April 21, 2021

